

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KARIM P. NAJJAR, *et. al.*, individually  
and behalf of all others similarly situated,

Plaintiffs,

v.

RIAD SALAMEH, *et al.*,

Defendants.

Civil Action No. 1:24-cv-05043-CPO-EAP

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME  
TO FILE PRE-MOTION LETTERS REQUESTING A PRE-MOTION CONFERENCE  
IN ADVANCE OF THEIR MOTIONS TO DISMISS THE  
FIRST AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Karim P. Najjar, Halim Abou-Faycal, Younes Bazzi, Jacques Fontaine, Mounir Jermany, Ibrahim Khreibani, Bechara Rizk, Samar Shami, Joseph Tleiji, Salim Tleiji and Ramzi Zibaoui (“Plaintiffs”), individually and on behalf of a proposed class of similarly situated persons, and Defendants BDO USA, P.C., Deloitte LLP, Deloitte & Touche LLP, and Ernst & Young U.S. LLP (collectively, “US Defendants”), submit this joint stipulation, subject to the approval of the Court, by and through their undersigned counsel and pursuant to Civil Local Rule 6.1 and Sections II and VIII of Your Honor’s Judicial Preferences, as follows:

1. WHEREAS, on April 17, 2024, Plaintiff Najjar filed a Class Action Complaint against the US Defendants and other defendants in the above-captioned action;
2. WHEREAS, on July 24, 2024, Plaintiffs filed a First Amended Class Action Complaint against the US Defendants and other defendants in the above-captioned action;

3. WHEREAS, the US Defendants preserve and have not waived any applicable defenses, including those pursuant to Federal Rule of Civil Procedure 12(b), such as lack of jurisdiction;

4. WHEREAS, counsel for Plaintiffs and counsel for the US Defendants have met and conferred and, subject to the Court's approval, agreed to extend the time within which the US Defendants may file letters requesting a pre-motion conference in advance of their motions to dismiss the First Amended Class Action Complaint;

5. WHEREAS, no prior extension of time has been sought by the parties to this stipulation;

6. THEREFORE, it is hereby stipulated and agreed that:

- a) The deadline for the US Defendants to file letters requesting a pre-motion conference in advance of their motions to dismiss the First Amended Class Action Complaint is extended to and including **October 7, 2024**.

**SO ORDERED.**

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Hon. Christine P. O'Hearn, U.S.D.J.

Dated: \_\_\_\_\_

Dated: August 14, 2024

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of August, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ David Kiefer